

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:20-cr-00713 CDP
)	
CAMERON TAYLOR,)	
)	
Defendant.)	

INFORMATION

COUNT 1

The United States Attorney charges that:

A. FINANCIAL INSTITUTION

1. At all times relevant to the indictment, Electro Savings Credit Union and West Community Credit Union were financial institutions insured by the federal government through the National Credit Union Association.

B. THE SCHEME TO DEFRAUD

2. Between on or about December 10, 2019 and October 1, 2020, within the Eastern District of Missouri, the defendant,

CAMERON TAYLOR,

devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

3. The scheme and artifice to defraud was in substance as follows:

- a. It was part of the scheme and artifice to defraud that Defendant fraudulently opened a business account in the name of CJT Enterprises LLC.
- b. It was further part of the scheme and artifice to defraud that Defendant applied for a loan to purchase a vehicle from Miller Towing listing his company CJT Enterprises LLC as the applicant, and himself as the co-applicant.
- c. It was further part of the scheme and artifice to defraud that the defendant submitted the following fraudulent documents in support of his application for a motor vehicle loan:
 - i. Fraudulent Buyer's Order from Miller's Towing that falsely claimed that the sales price of the vehicle was \$48,000.00, and that Defendant had made a down-payment of \$21,191.24 to Miller's Towing;
 - ii. Loan application that fraudulently claimed that CJT Enterprise LLC and Defendant had \$80,000.00 cash in the bank and \$53,000.00 in a 401K/IRA; and
 - iii. A check drawn on the Scott Credit Union account of Rush Motorsports and Sales LLC that falsely represented an electronic payment to Miller Towing in the amount of \$21,191.24.
- d. It was further part of the scheme and artifice to defraud that Defendant induced Electro Savings Credit Union into depositing \$39,994.00 into the credit union account of CJT Enterprises LLC.

- e. It was further part of the scheme and artifice to defraud that Defendant caused Electro Savings Credit Union to believe that the value of the collateral pledged for the motor vehicle loan was \$48,000.00.
- f. It was further part of the scheme and artifice to defraud that Defendant paid Miller Towing \$31,000.00 rather than the sales price of \$52,294.24 represented on the fraudulent buyer's order submitted to the credit union.
- g. It was further part of the scheme and artifice to defraud that CJT Enterprises LLC provided \$8,000.00 of the loan proceeds to Defendant.

C. The Financial Transactions

4. On or about December 17, 2019, in the Eastern District of Missouri, the defendant, **CAMERON TAYLOR**, executed and attempted to execute the scheme and artifice as set forth above, in that, **CAMERON TAYLOR** submitted fraudulent and fictitious documents to Electro Savings Credit Union in support of a loan application for himself and his company CJT Enterprises LLC in the amount of \$40,000.00.

In violation of Title 18, United States Code, Section 1344.

COUNT 2

(Aggravated Identity Theft)

5. On or about February 5, 2019, in the Eastern District of Missouri, the defendant, **CAMERON TAYLOR**, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, to wit, the name of J.F., in order to fraudulently obtain a motor vehicle loan from

West Community Credit Union in the amount of \$40,000.00, that being during and in relation to the commission of the felony offenses of bank fraud, Title 18, United States Code, Section 1344 and social security fraud, Title 42, United States Code, Section 408(a)(7)(B).

In violation of Title 18, United States Code, Section 1028A.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 982(a)(2), upon conviction of an offense in violation of Title 18, United States Code, Section 1344 as set forth in Count 1, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation(s).

2. Subject to forfeiture is a sum of money equal to the total value of any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation(s), which is at least \$79,994.00.

3. If any of the property described above, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to

Title 21, United States Code, Section 853(p).

Respectfully submitted,

JEFFREY B. JENSEN
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UNITED STATES OF AMERICA)
EASTERN DIVISION)
EASTERN DISTRICT OF MISSOURI)

I, Tracy L. Berry, Assistant United States Attorney for the Eastern District of Missouri,
being duly sworn, do say that the foregoing information is true as I verily believe.

/s/ Tracy L. Berry
TRACY L. BERRY 014753 TN

Subscribed and sworn to before me this 30th day of October 2020.

Gregory J. Linhares
CLERK, U.S. DISTRICT COURT

By: /s/Jason W. Dockery
DEPUTY CLERK

